

- 1b. Specifically, is it permissible to put monitoring wells 30 feet back from the compliance point in the event physical or institutional barriers preclude placement at the point?
- b. The rule specifically states that the point of compliance (POC) will be at the limit of the waste management area. In one draft manual (i.e., the Draft Permit Writers Manual for Ground-Water Protection, May 1983), OSW proposed a 30 foot “slush zone” in which one could place monitoring wells for the compliance point. However, such guidance is inconsistent with the regulations, and is, therefore, inappropriate. This guidance was removed from the next edition (October 1983). Where it is physically impossible to comply with the letter of the regulation, the Regional Office may exercise enforcement discretion on a case by case basis.

SOURCE: George Dixon (382-4494)
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